

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED

U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

NOV -9 2011

DAVID J. MALAND, CLERK

BY

DEPUTY

NO. 4:11CR 223
Judge Crone

UNITED STATES OF AMERICA §
v. §
RAMIRO BENJUME PERDOMO (1) §
a.k.a. "Arturo" §
ANDREA GARCIA CRUZ (2) §
a.k.a. Andrea Rodriguez, "The Lady," §
"Lady D," "The Boss Lady" §
ROBERTO REYES SANCHEZ (3) §
BRANDON CURTIS WILSON (4) §
CHRISTOPHER WAYNE ALDRIDGE (5) §
JOSEPH ALLEN CASE (6) §
ROBERT PRUDY YORK (7) §
MORGAN BENNETT CHEATHAM (8) §
a.k.a. "Morgan West" §
WILLIAM RICHARD COLEMAN (9) §
BLAKE AARON PICKEL (10) §
DAYTON SCOTT TAYLOR (11) §
HIRAM EDWARD ENGLE (12) §
a.k.a. "Chino" §
CHAZ EDWARD RENFRO (13) §
ASHLEY LYNN FERRELL (14) §
BROOKE DANIELLE LEE (15) §
JENNIFER BAILEY ROBBS (16) §
JERRY LYNN POIRIER (17) §
JOSE SANTOS RODRIGUEZ (18) §

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846
(Conspiracy to Distribute and
Possess with Intent to Distribute
Heroin and Cocaine)

In or about 2008, the exact date unknown to the Grand Jury, and continuing thereafter up to and including the date of the filing of this Indictment, in the Eastern District of Texas and elsewhere, RAMIRO BENJUME PERDOMO, a.k.a. "Arturo," ANDREA GARCIA CRUZ a.k.a. "Andrea Rodriguez," "The Lady," "Lady D," "The Boss Lady," ROBERTO REYES SANCHEZ, BRANDON CURTIS WILSON, CHRISTOPHER WAYNE ALDRIDGE, JOSEPH ALLEN CASE, ROBERT PRUDY YORK, MORGAN BENNETT CHEATHAM a.k.a. "Morgan West," WILLIAM RICHARD COLEMAN, BLAKE AARON PICKEL, DAYTON SCOTT TAYLOR, HIRAM EDWARD ENGLE a.k.a. "Chino," CHAZ EDWARD RENFRO, ASHLEY LYNN FERRELL, BROOKE DANIELLE LEE, JENNIFER BAILEY ROBBS, JERRY LYNN POIRIER and JOSE SANTOS RODRIGUEZ defendants, did knowingly and intentionally conspire and agree together with each other and with other persons known and unknown to the Grand Jury to distribute or possess with intent to distribute the following controlled substances: one kilogram or more of a mixture or substance containing a detectable amount of heroin and 500 grams or more of a mixture or substance containing a detectable amount of cocaine in violation of 21 U.S.C. § 841.

All in violation of 21 U.S.C. § 846.

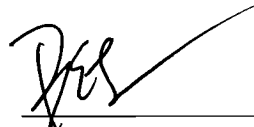
NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 21 U.S.C. § 853

As a result of committing the offense charged in this indictment, the defendants may have used, or intended to use, property to commit or facilitate the offenses and/or property derived from proceeds obtained directly or indirectly as a result of the commission of the violation of 21 U.S.C. § 846.

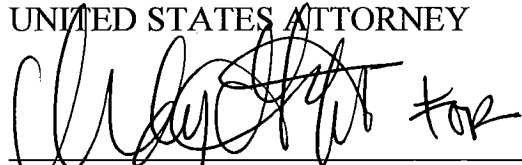
All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL



GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY



HEATHER H. RATTAN
ASSISTANT UNITED STATES ATTORNEY

November 9, 2011

Date

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NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846

Penalty: Imprisonment for not less than ten (10) years or more than life, a fine not to exceed \$10,000,000.00 or both. A term of supervised release of at least five (5) years;

Special Assessment: \$100.00

If death or serious bodily injury results from the use of such substance, the penalty is:

Penalty: Life imprisonment, a fine not to exceed \$20,000,000

Special Assessment: \$100.00